

1 **WEIL, GOTSHAL & MANGES LLP**
2 Theodore E. Tsekerides (*pro hac vice*)
(theodore.tsekerides@weil.com)
2 Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
3 Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
4 767 Fifth Avenue
5 New York, NY 10153-0119
5 Tel: (212) 310-8000
6 Fax: (212) 310-8007

7 **KELLER BENVENUTTI KIM LLP**

8 Tobias S. Keller (#151445)
(tkeller@kbkllp.com)
9 Jane Kim (#298192)
(jkim@kbkllp.com)
10 David A. Taylor (#247433)
(dtaylor@kbkllp.com)
11 650 California Street, Suite 1900
12 San Francisco, CA 94108
12 Tel: 415 496 6723
12 Fax: 650 636 9251

13 *Attorneys for Debtors and Reorganized
14 Debtors*

15 **UNITED STATES BANKRUPTCY COURT**

16 **NORTHERN DISTRICT OF CALIFORNIA**

17 **SAN FRANCISCO DIVISION**

18 In re:

19 **PG&E CORPORATION,**

20 **- and -**

21 **PACIFIC GAS AND ELECTRIC COMPANY,**
22 **Debtors.**

23 Affects PG&E Corporation
23 Affects Pacific Gas and Electric Company
24 Affects both Debtors

Case No. 19-30088 (DM)

Chapter 11
(Lead Case) (Jointly Administered)

**STIPULATION CONTINUING
HEARING ON TIGER NATURAL
GAS, INC.'S MOTION FOR RELIEF
FROM PLAN INJUNCTION**

[Relates to Docket No. 11535]

Current Hearing Date: December 7, 2021
New Hearing Date: December 21, 2021

25 * *All papers shall be filed in the Lead Case,
26 No. 19-30088 (DM).*

1 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
2 debtors and reorganized debtors (collectively, the “**Debtors**” and as reorganized pursuant to the Plan,¹
3 the “**Reorganized Debtors**”) in the above-captioned cases (the “**Chapter 11 Cases**”), on the one hand,
4 and Tiger Natural Gas, Inc. (“**Tiger**,” and, together with the Debtors and Reorganized Debtors, the
5 “**Parties**”), on the other hand, by and through their respective counsel, hereby stipulate and agree as
6 follows:

7 **RECITALS**

8 A. On January 29, 2019 (the “**Petition Date**”), the Debtors commenced these Chapter 11
9 Cases in the United States Bankruptcy Court for the Northern District of California (the “**Bankruptcy**
10 **Court**”). The Chapter 11 Cases are being jointly administered for procedural purposes only pursuant
11 to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure.

12 B. On November 4, 2021, Tiger filed the *Motion for Relief from Plan Injunction* [Docket
13 No. 11535] (the “**Motion**”), in which it requested that this Court modify the Plan Injunction to permit
14 *Tiger Natural Gas, Inc. v. Pacific Gas and Electric Company, et al.*, Case No. 16-06711 pending in the
15 United States District Court for the Northern District of California to proceed.

16 C. The hearing on the Motion currently is scheduled for December 7, 2021 at 10:00 a.m.
17 (Pacific Time).

18 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE
19 INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS
20 STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE
UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE BANKRUPTCY COURT
TO ORDER, THAT:**

21 1. The Hearing shall be continued to December 21, 2021 at 10:00 a.m. (Pacific Time).
22 The December 7, 2021 hearing on the Motion is taken off the Court’s calendar.

23 2. The time for the Reorganized Debtors to submit any response to the Motion shall be
24 extended to December 7, 2021.

25 3. Any reply by Tiger must be filed by December 14, 2021.

26 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the
27 *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020*
28 (as may be further modified, amended or supplemented from time to time, and together with any
exhibits or scheduled thereto, the “**Plan**”).

1 4. Nothing herein shall be construed to be a waiver by the Debtors or the Reorganized
2 Debtors, as applicable, or any other party in interest, of any rights or defenses with respect to the
3 Motion or otherwise.

4 5. This Stipulation may be executed in counterparts, each of which shall be deemed an
5 original but all of which together shall constitute one and the same agreement.

6 6. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or controversies
7 arising from this Stipulation or any Order approving the terms of this Stipulation.

8
9 Dated: November 19, 2021

10 Dated: November 19, 2021

11 **KELLER BENVENUTTI KIM LLP**

12 **HOLLAND & KNIGHT LLP**

13 */s/ David A. Taylor*

14 David A. Taylor

15
16 *Attorneys for Debtors*
17 *and Reorganized Debtors*

18 */s/ Leah E. Capritta*

19 Leah E. Capritta

20 *Attorneys for Tiger Natural Gas, Inc.*